

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Northern Division

UNITED STATES OF AMERICA,

Plaintiff,

- against -

Civil No. _____

\$104,250.00 in U.S. Currency,

Defendant.

-----X

VERIFIED COMPLAINT FOR FORFEITURE

Plaintiff, United States of America, by its attorneys, Rod Rosenstein, United States Attorney for the District of Maryland, and Stefan D. Cassella, Assistant U.S. Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is a civil forfeiture action against U.S. currency involved in violations of the Controlled Substances Act and the money laundering statutes, making the currency subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(A), respectively.

THE DEFENDANTS IN REM

2. The defendant is \$104,250.00 in U.S. Currency.
3. The defendant property was seized at the TSA security checkpoint at BWI Airport on September 7, 2012.

JURISDICTION AND VENUE

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(A).
- 5.. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. 1355(b).
6. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district and pursuant to 28 U.S.C. § 1395 because the property is located in this district.

BASIS FOR FORFEITURE

7. The defendant currency is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because is was money furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act, constituted proceeds traceable to such an exchange, and was used and intended to be used to facilitate such violation.
8. The defendant currency is also subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it was involved in a violation of 18 U.S.C. § 1956.

FACTS

9. On September 7, 2012, a person using the name Norma Fouche passed through the TSA checkpoint at B-Pier, Lane 4 at BWI Thurgood Marshall Airport.
10. “Fouche” was ticketed to board Southwest Airlines flight 304 to Phoenix.
11. When “Fouche” passed through the checkpoint, she was in possession of a carry-on bag that contained a package wrapped in birthday paper.
12. Upon examination by law enforcement personnel, the package was found to contain

\$104,250.00 in U.S. currency, wrapped in black paper with the ends taped closed so that none of the currency was visible.

13. The money was in two large bundles of various denominations, wrapped in smaller bundles with preprinted bands.
14. "Fouche" stated that the money belonged to her, and that she had just received it as payment for an estate.
15. A K-9 displayed a positive alert to the odor of a controlled substance on the currency.
16. "Fouche's" true name is Norma Gibson.
17. In addition to "Norma Fouche," Gibson has used various other aliases, including Sharon Brown, Norma Ruth Del, Norma M. Fouche, Norma R. Fouche, Norma R. Gibson, Normana Gibson, Norma Mahon, Norma R. Mahon, Norma Matton, Norma Wilson, Norma N. Wilson, and Sandy Wilson.
18. Gibson has been arrested multiple times for criminal offenses in Arizona, New York and other places.
19. Gibson's criminal record includes arrests involving the possession and distribution of a controlled substance, the possession of a loaded firearm, aggravated assault, and interference with judicial proceedings.

WHEREFORE, the plaintiff prays that all persons who reasonably appear to be potential claimants with interests in the defendant property be cited to appear herein and answer the complaint; that the defendant property be forfeited and condemned to the United States of America; that upon Final Decree of Forfeiture, the United States Marshal dispose of the defendant property according to law; and that the plaintiff have such other and further relief as

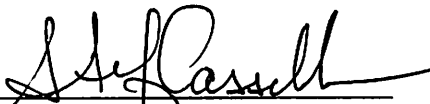
this Court deems proper and just.

Dated: December 4, 2012

Respectfully submitted,

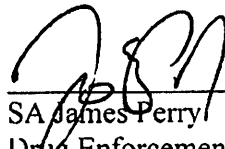
Rod J. Rosenstein
UNITED STATES ATTORNEY
District of Maryland

By:


Stefan D. Cassella
Assistant U.S. Attorney
36 South Charles Street
Fourth Floor
Baltimore, MD 21201
410 209-4986

VERIFICATION

I, James Perry, am a Special Agent of the Drug Enforcement Administration and declare under penalty of perjury as provided by 28 U.S.C. § 1746, that everything contained in the foregoing Complaint for Forfeiture *in rem* is true and correct to the best of my knowledge and belief.


SA James Perry
Drug Enforcement Administration

12/3/12

MEMORANDUM

DATE: December 4, 2012

TO: Kristine Cupp
U.S. Marshal Service

FROM: Naquita C. Ervin
FSA Paralegal Specialist
U.S. Attorney's Office - District of Maryland

RE: **U.S. v. \$104,250 U.S. CURRENCY**

Civil Action No.

CATS ID 12-DEA-571647 – GC-12-0196

The United States has filed a forfeiture action against **\$104,250 U.S. CURRENCY**. A copy of the Complaint for Forfeiture is attached.


Notice of this seizure will be published at www.forfeiture.gov pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims.

Thank you.

Attachment

**U.S. Department of Justice
United States Marshals Service**
**PROCESS RECEIPT AND
RETURN**

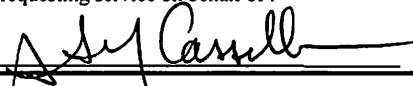
PLAINTIFF UNITED STATES OF AMERICA	COURT CASE NUMBER
DEFENDANT \$104,250 U.S. Currency	TYPE OF PROCESS Verified Complaint in Rem

SERVE  AT	NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN GC-12-0196 / 12-DEA-571647
	ADDRESS (Street or RFD, Apartment No., City, State, and ZIP Code)

SEND NOTICE OF SERVICE TO REQUESTER AT NAME AND ADDRESS BELOW:	Number of process to be served with this Form - 285	
Naquita C. Ervin, FSA Paralegal Specialist U.S. Attorney's Office 36 S. Charles Street, 4th floor Baltimore, Maryland 21201	Number of parties to be served in this case	
	Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Address, All Telephone Numbers, and Estimated Times Available For Service)

Arrest property. Fill in the date of arrest in this process receipt and return our copy.

Signature of Attorney or other Originator requesting service on behalf of: 	TELEPHONE NUMBER 410-209-4800	DATE 12/4/12
-----------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------	------------------------

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process No. _____	District of Origin No. _____	District to Serve No. _____	Signature of Authorized USMS Deputy or Clerk _____	Date _____
-------------------------------------------------------------------------------------------------------------------------------------	----------------------------	---------------------------------	--------------------------------	-------------------------------------------------------	---------------

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc. at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below).

Name and title of individual served (If not shown above).	<input type="checkbox"/> A person of suitable age and discretion then residing in the defendant's usual place of abode.			
Address (complete only if different than shown above)				
<table border="1"> <tr> <td>Date of Service</td> <td>Time am pm</td> </tr> <tr> <td colspan="2">Signature of U.S. Marshal or Deputy</td> </tr> </table>		Date of Service	Time am pm	Signature of U.S. Marshal or Deputy
Date of Service	Time am pm			
Signature of U.S. Marshal or Deputy				

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount Owed to US Marshal or	Amount or Refund
-------------	------------------------------------------------	----------------	---------------	------------------	------------------------------	------------------

REMARKS: